

14mj360(1)JSM

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF TIMOTHY GREGG
COUNTY OF HENNEPIN)

I, Timothy Gregg, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) assigned to the Special Agent in Charge (SAC), St. Paul, Minnesota office and have been so employed since August 2008. Prior to my employment with HSI, I was employed as a Customs and Border Protection Officer for six years and as a Security Policeman with the U.S. Air Force for eight years. I was duly appointed according to law at the time of the events herein and was acting in my official capacity.

2. This affidavit is based on my knowledge and information that was obtained by other agents involved in the investigation. This affidavit does not contain all the facts and circumstances pertaining to this investigation.

3. The testimony of Ranjith RAJENDRAN (hereafter RAJENDRAN) is material to a criminal proceeding filed under seal in the United States District Court, District of Minnesota, entitled In the Matter of the Search of Curry N Noodles, A Restaurant Located at 802 Mainstreet in Hopkins, Minnesota, Case Number 14-mj-360 (JSM).

4. RAJENDRAN is a native and citizen of India who is illegally or unlawfully present in the United States. RAJENDRAN arrived in the United States on October 9,

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U.S. DISTRICT COURT ST. PAUL

2009 on a C1 (crewman) visa. A C1 visa is used by foreign nationals that plan on transiting through the United States when the final destination is another country. It is primarily used by crew members of commercial air and sea vessels. C1 visa holders may stay for a maximum of 29 days in the United States and are required to leave the United States on the proposed flight or ship of departure or within 29 days, whichever is earlier. Since November 2009, RAJENDRAN has not been legally present in the United States, and he has not had work authorization.

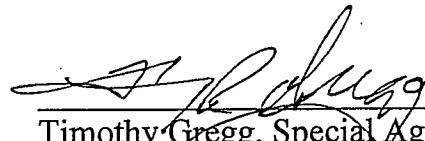
5. On May 19, 2014, RAJENDRAN was encountered in Hopkins, Minnesota, as an employee unauthorized to work at Curry N Noodles restaurant.

6. RAJENDRAN was interviewed by HSI agents. During the interview, RAJENDRAN provided statements that are material to the government in that he identified information material to possible criminal charges against the current and former owners of Curry N Noodles, including Prem GOLLAPALLI, Lalitha EDUPUGANTI, and Sreeram POTHULA, of unlawful hiring, bringing in and harboring certain aliens, and conspiracy.

7. RAJENDRAN has been placed under removal or deportation proceedings that may result in removal from the United States prior to the completion of the criminal proceedings resulting from the investigation into Curry N Noodles.

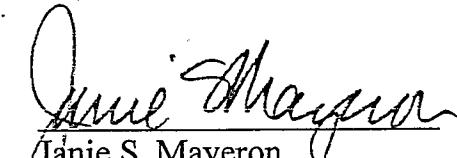
8. Because of the impending deportation, it would be impractical to secure the presence of RAJENDRAN by subpoena.

All statements contained in this affidavit are true and correct to the best of my knowledge.



Timothy Gregg, Special Agent
Homeland Security Investigations

Sworn to before me and subscribed in my presence on this 20th day of May 2014, at Minneapolis, Minnesota.



Janie S. Mayeron
United States Magistrate Judge